

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

TWIANIE ROBERTS,  
INDIVIDUALLY

Plaintiff,  
vs.

Case No. 2:08-CV-10992  
Hon. JOHN FEIKENS

CONTINENTAL AIR TRANSPORT, CO.,  
AN ILLINOIS CORPORATION, D.B.A.  
CONTINENTAL AIRPORT EXPRESS, INC.,  
DENISE COLLINS, INDIVIDUALLY AND  
ROBERT JOHNIGAN, INDIVIDUALLY.

Defendants.

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PATRICIA WORRALL (P62984)  
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535 Griswold – Suite 2400  
Detroit, MI 48226  
(313) 983-4919

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

1. Admit
2. Admit
3. Admit
4. Admit
5. Deny. John McCarthy, president of Continental Air Transport, which does business as Continental Airport Express, Inc. is also the president of GO Airport Express, a company operated by Continental Air Transport. Furthermore, GO Airport Express is a world wide transportation company which prides itself on being "A Premier, Global Ground Transportation Services Company" and also provides transportation services in the State of Michigan, more importantly, in the City of Detroit.
6. Admit that Denise Collins was a resident of the State of Illinois at the time of this collision. However, Denise Collins at the time of the collision was an employee and

representative of Continental Airport Express and is therefore subject to the same venue and jurisdiction as her employer.

7. Deny. See numbers 5 and 6 above and accompanying Brief.
8. Deny. See numbers 5 and 6 above and accompanying Brief.

Respectfully submitted,

THE THURSWELL LAW FIRM, P.L.L.C.

S/Patricia L. Worrall

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DATED: June 2, 2008

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**BRIEF IN SUPPORT OF PLAINTIFF'S RESPONSE  
TO DEFENDANTS' MOTION TO DISMISS**

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**QUESTIONS PRESENTED**

**DID DEFENDANTS MAINTAIN SUFFICIENT MINIMUM CONTACTS WITH THE STATE OF MICHIGAN SO THAT THE EXERCISE OF PERSONAL JURISDICTION OVER DEFENDANTS WOULD NOT OFFEND THE TRADITIONAL NOTIONS OF FAIR PLAY AND SUBSTANTIAL JUSTICE?**

Plaintiff answers: "Yes."

Defendants answer: "No."

**IS THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN THE APPROPRIATE AND EFFICIENT VENUE FOR THIS ACTION.**

Plaintiff answers: "Yes."

Defendants answer: "No."

### COUNTER-STATEMENT OF FACTS

Plaintiff agrees with Defendants' recitation of facts except for Defendant's position that Continental Air Transport and Denise Collins "ha[ve] not solicited or otherwise transacted business within the State of Michigan." As will be further set forth below Continental Air Transport, Co. has maintained direct and continuous business contacts with the State of Michigan through its subsidiary, GO Airport Express, rendering it subject to personal jurisdiction in the State of Michigan. (See Exhibits A and B). Likewise, Denise Collins, at the time of this accident was operating a vehicle owned by Continental Air Transport, Co. Therefore, since at the time of this collision Ms. Collins was acting as an employee and representative of Continental Air Transport, Co., she is subject to the same jurisdiction and venue as her employer.

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**ARGUMENT****I. DEFENDANT CONTINENTAL AIR TRANSPORT, CO. d/b/a CONTINENTAL AIR EXPRESS, INC AND DENISE COLLINS MAINTAIN SUFFICIENT MINIMUM CONTACTS WITH THE STATE OF MICHIGAN**

In this matter Defendant, Continental Air Transport, Co. and its subsidiary Continental Airport Express, Inc. are subject to the jurisdiction of this Court and venue is proper in this Court. Defendant has provided an affidavit in this matter stating that they do not do business in the State of Michigan. After conducting a little bit of research on Defendant's corporate profile and history, it is clear that Defendant and/or Defendant's subsidiary companies conduct regular and continuous business activities in the State of Michigan. Continental Air Transport, CO operates both Continental Airport Express and GO Airport Express. John McCarthy, the president of Continental Air Transport is also the president of GO Airport Express. Pursuant to an August 2, 2007 press release in Forbes Magazine, Go Airport Express:

Serv[es] 110 airports as geographically diverse as Kahului Airport in Maui, Hawaii, Love Field in DFW and Charles De Gaulle Airport in France, GO boasts a fleet of 3,765 vehicles, carrying almost 29 million passengers annually. (Exhibit A – 8/2/07 Press Release).

According to GO Airport Express's website they provide services at Detroit Metropolitan Airport and serve the greater Detroit area. (Exhibit B – Detroit Metro Airport Reservation Sheet). In that same Forbes Magazine press release, President John McCarthy is quoted as stating that:

"The GO concept responds to a growing demand in the market for a single-source ground transportation company . . . [c]orporate travel managers, convention managers and travel companies tell us they want to do business with one supplier and one billing system . . . [w]e believe that individual travelers also will appreciate the opportunity to have a single reliable source for airport transportation, regardless of destination." (Exhibit A- 8/2/07 Press Release).

Does Defendant, Continental Air Transport, Co. maintain sufficient minimum contacts



with the State of Michigan such that imposition of personal jurisdiction would not offend the traditional notions of fair play and substantial justice? Yes. While the cause of this action did arise in the State of Illinois, that alone does not preclude personal jurisdiction in the State of Michigan. Under the Modern Approach of personal jurisdiction, the following two questions must be answered in the positive:

1. Does Continental Air Transport, Co. maintain sufficient minimum contacts with the State of Michigan?
2. Does imposing personal jurisdiction over Continental Air Transport, Co. in the State of Michigan offend the traditional notions of fair play and substantial justice?

*International Shoe Co. v Washington*, 326 U.S. 310, 316; 66 S.Ct. 154; 90 L.Ed. 95 (1945)(Citations omitted).

When answering the above question, the following factors must also be assessed:

1. Where did the cause of action arise?
2. Does Continental Air Transport, Co. maintain systematic and continuous activities in the State of Michigan?
3. Did Continental Air Transport, Co. purposefully avail itself of the laws and protection of the State of Michigan?
4. Is it foreseeable that Continental Air Transport would be haled into Court in the State of Michigan?
5. Did Continental Air Transport initiate contact with the State of Michigan?

When dealing with the traditional notions of fair play and substantial justice prong of the personal jurisdiction requirement, the following factors are also important:

1. The burden on the parties?
2. Which States law will apply?
3. Does the State of Michigan have any interest to be protected?
4. Will all suits be resolved in this action?
5. Is the State of Michigan Fair and convenient forum?
6. The convenience and accessibility of evidence?
7. The convenience to any witnesses involved?

Below, Plaintiff will show how the vast majority of all of the above factors weigh in favor of personal jurisdiction in the United States District Court for the Eastern District of Michigan.

**1. Where did the cause of action arise?**

While the motor vehicle collision which gives rise to this action occurred in the City of Chicago, State of Illinois, that fact alone does not preclude jurisdiction over the Defendants in the State of Michigan. Furthermore, there was no police investigation of this accident and no police report was generated. To date there have been no witnesses to this accident identified. There is no compelling reason and/or factor which would require this matter to be litigated in the State of Illinois.

**2. Does Continental Air Transport, Co. maintain systematic and continuous activities in the State of Michigan?**

Defendants maintain systematic and continuous direct activities in the State of Michigan and more specifically in the City of Detroit. This is clearly seen in Plaintiff's exhibit B which is an online reservation sheet for GO Airport Shuttle a company operated by Defendant, Continental Air Transport, Co. This reservation sheet shows that GO Airport Shuttle serves the Detroit Metropolitan Airport and provides vehicles for travelers at 26500 Van Born Road, Dearborn Heights, MI 48125. (Exhibit B – Online Reservations Sheet).

**3. Did Continental Air Transport, Co. purposefully avail itself of the laws and protection of the State of Michigan?**

Plaintiff agrees with Defendants statement in its brief that "purposeful availment is more than a passive availment of the forum state's protection or opportunities, it is a deliberate undertaking", *Bridgeport Music, Inc. v Still N the Water Pub*, 327 F.3d 472, 478 (6<sup>th</sup> Cir. 2003). That is exactly what we have here, a deliberate undertaking. Continental Air

Transport, Co. purposefully availed themselves of the jurisdiction of the State of Michigan. Continental Air Transport, Co. made a cognitive decision to expand its business to serve the State of Michigan as part and parcel of their corporate plan of being a global transportation provider.

**4. Is it foreseeable that Continental Air Transport would be haled into Court in the State of Michigan?**

In order for this Court to exercise personal jurisdiction over the defendants in this matter the defendants must have conducted themselves in a manner so that they could “reasonably anticipate being haled into court” in the State of Michigan. *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980). Not only is it feasible that Defendant Continental Air Transport, Co. would be haled into Court in the State of Michigan, it is foreseeable for Defendant to be haled into almost any Court around the world. Although, Defendant would have this Court believe that it is a local “mom and pop” transportation company that only serves the City of Chicago, that is just not true. This is a large multi-national, multi-million dollar corporation that, according to it’s advertisements “Serv[es] 110 airports as geographically diverse as Kahului Airport in Maui, Hawaii, Love Field in DFW and Charles De Gaulle Airport in France, GO boasts a fleet of 3,765 vehicles, carrying almost 29 million passengers annually.” Most importantly, included in that 110 airports is the Detroit Metropolitan Airport. (See Exhibit B).

Furthermore, the Defendant provides ground transportation services to residents of the State of Michigan and on the public roads and highways of the State of Michigan. These activities are inherently dangerous. Tens of thousands of motor vehicle accidents occur on the public roadways of the State of Michigan every year. Each time one of Defendant’s transportation vehicles enters onto a Michigan roadway it potentially places its passengers and

other drivers on the roadways in danger.

**5. Did Continental Air Transport initiate contact with the State of Michigan?**

This factor requires no analysis or argument since the business activities that Defendant conducts in the State of Michigan were clearly initiated by Continental Air Transport, Co. through its subsidiary GO Airport Shuttle.

**II. IMPOSITION OF PERSONAL JURISDICTION OVER DEFENDANTS IN THE STATE OF MICHIGAN DOES NOT OFFEND THE TRADITIONAL NOTIONS OF FAIR PLAY AND SUBSTANTIAL**

**1. The burden on the parties?**

Jurisdiction in the State of Michigan will not place an undue burden on either party and it is the most efficient jurisdiction. As stated earlier, the collision which gives rise to this action occurred in the City of Chicago, State of Illinois. However, there was no police investigation of this collision. There were no known witnesses to this collision. Plaintiff resides in the City of Detroit, State of Michigan. Each and every one of Plaintiff's treating physicians practice in the City of Detroit or its surrounding localities. Plaintiff's friends and family who observe Plaintiff on a regular basis all reside in the greater Detroit area and many of them will be called as damage witnesses in trial of this matter. Defendant, Continental Air Transport, Co., while being headquartered in the City of Chicago, has purposefully availed itself of jurisdiction in this State by its cognitive and willful business activities in the State of Michigan. Defendant should not be surprised that it is being brought into a Michigan court under allegations of automobile negligence when they operate a large scale automobile transportation company within the State of Michigan. While the accident that gives rise to this action occurred in the City of Chicago, the contacts with the City of Chicago end with that accident.

Each of Plaintiff's treating doctors will have their deposition testimony taken at their office in the greater Detroit area. Any defense medical examiner chosen by Defendant to examine Plaintiff would be based in the greater Detroit area. All of Plaintiff's damage witnesses reside in the greater Detroit area. Of course, Plaintiff's counsel would depose Defendants and/or their representatives in the City of Chicago, and is more than willing to travel to Chicago to do so. Lastly, the attorneys who currently represent the Defendants have offices in the greater Detroit area.

**2. Which States law will apply**

Under the Erie Railroad Doctrine, the substantive law of the State of Illinois (the situs of the accident) would apply in this case. *Erie R. Co. v Tompkins*, 304 U.S. 64, 58 S.Ct. 817, 82 L.Ed. 1188 (1938).

**3. Does the State of Michigan have any interest to be protected?**

The State of Michigan clearly has an interest in protecting its citizens as they travel along the roadways of the State of Michigan. They also have an interest in ensuring that companies who conduct business in the State of Michigan do so in a safe and reasonable manner especially when those business activities can cause harm to innocent citizens.

**4. Will all suits be resolved in this action?**

Yes. All suits can be resolved in this single action.

**5. Is the State of Michigan a fair and convenient jurisdiction?**

Yes. As stated above Defendants have sufficient minimum contacts with the State of Michigan to be haled into a Michigan court. Furthermore, the cities of Detroit and Chicago are in relatively close proximity together and are connected by I-94 a large interstate highway traveling between Detroit and Chicago. Each and every individual who will provide testimony

in this matter, with the exception of defendants, are located in the greater Detroit area. All counsel of record are located in the greater Detroit area. Michigan is the most fair and convenient jurisdiction.

**6. The convenience and accessibility of evidence?**

There is no evidence, with the exception of Defendants testimony, located in the city of Chicago. Furthermore, the vast majority of individuals who will provide testimony in this matter are located in the greater Detroit area.

**7. The convenience and availability of witnesses?**

Again, with the exception of the Defendants, each and every individual who will provide testimony in this matter are located in the greater Detroit area.

Furthermore, Defendant all but lays out Plaintiff's argument for personal jurisdiction over Defendants on pages 4 and 5 of its Brief. Defendant cites to M.C.L. § 600.715 which provides, in pertinent part:

The existence of any of the following relationships between a corporation or its agent and the state **shall constitute a sufficient basis of jurisdiction** to enable the courts of record of this state to exercise limited personal jurisdiction over such corporation and to enable such courts to render personal judgments against such corporation arising out of the act or act which create any of the following relationships:

1. The transaction of any business within the state.
5. Entering into a contract for services to be performed or for materials to be furnished in the state by the Defendant.

As previously stated in this Brief, Defendant provides transportation services in and around the Detroit Metropolitan Airport and has entered into contracts with residents of the State of Michigan to provide transportation services for those residents.

It is also apparent that Defendant's contacts with the State of Michigan and the

City of Detroit were cognitive, volitional and beneficial to the Defendants. Pursuant to a Press Release issued by John McCarthy, Defendant's objective was to create a "single-source ground transportation company." (See Exhibit A). Sort of a one-stop shopping mall for ground transportation services operated by Continental Air Transport, Co. They chose to operate their transportation vehicles in the State of Michigan and in the City of Detroit. Clearly, this is not a charitable organization and they profit monetarily from these services in the City of Detroit and by operating in the State of Michigan. Expanding their transportation services to the State of Michigan allows them to add one more state to their "Global Ground Transportation Services Company." This fact certainly benefits their financial status, corporate image and expands their advertising market.

**III. THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN IS THE PROPER VENUE FOR THIS ACTION**

Plaintiff agrees with Defendant's recitation of 28 U.S.C. § 1391 inasmuch as a defendant corporation "shall be deemed to reside in any judicial district in which it is subject to personal jurisdiction at the time the action is commenced." 28 U.S.C. § 1391(c). As stated above, Defendants by providing transportation services in Detroit, Michigan through its subsidiary GO Airport Express is subject to personal jurisdiction in the State of Michigan and for purposes of this litigation can be deemed to reside in the Eastern District of Michigan.

**CONCLUSION**

Defendant concedes in its brief that if minimum contacts exist between Defendants and the State of Michigan, then personal jurisdiction over the Defendants would be proper in this Court. As laid out above, Defendant maintains sufficient minimum contacts with the State of Michigan to be subject to personal jurisdiction in this Court. It is not even a close call,

Defendant maintains direct and continuous business activities in the State of Michigan through its subsidiary company Go Airport Express. Furthermore, this Michigan is the most convenient jurisdiction and this Court is the proper and most convenient venue as practically all individuals who will be testifying in this matter, with the exception of Defendants, reside in the greater Detroit area.

**WHEREFORE** Plaintiff, TWIANIE ROBERTS by and through her attorneys, THE THURSWELL LAW FIRM, respectfully requests that this Honorable Court enter an Order DENYING Defendant's Motion to Dismiss and allow this case to continue in the United States District Court for the Eastern District of Michigan.

Respectfully submitted,

By: S/Patricia L. Worrall  
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PATRICIA WORRALL (P62984)  
Attorneys for Plaintiff  
[pworrall@thurswell.com](mailto:pworrall@thurswell.com)

Date: June 2, 2008

**CERTIFICATE OF SERVICE**

I certify that on June 3, 2008, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following: Edward J. Higgins, Esq., and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: None.

S/Kathryn A. White  
Kathryn A. White  
[kwhite@thurswell.com](mailto:kwhite@thurswell.com)



INDEX OF EXHIBITS

Exhibit A - Press Release

Exhibit B - Detroit Metro Airport Reservation Sheet

## EXHIBIT A

More From **Forbes**

- Latest Investing Idea's
- Alter Your Retirement Mind-Set
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CHICAGO, Aug. 2 /PRNewswire/ -- Forty independent transportation companies in the United States, Canada, Mexico, England, France, Italy, Scotland and Spain today announced the formation and launch of the world's largest door-to-door airport shuttle company, GO Airport Shuttle, Inc.

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Serving 110 airports as geographically diverse as Kahului Airport in Maui, Hawaii, Love Field in DFW and Charles De Gaulle Airport in France, GO boasts a fleet of 3,765 vehicles, carrying almost 29 million passengers annually.

The local companies, each of which formerly operated under a separate name, are currently converting their vans, motor coaches and sedans to a uniform green and white GO identity.

A key component of the new company's business model is a central, Web-based reservation system, <http://www.goairportshuttle.com>, which also launches today. Through it, customers can visit one Web site (<http://www.goairportshuttle.com>) to book transportation to and from both departure and destination airports, or they can call one phone number 877-544-GOGO (4646).

"The GO concept responds to a growing demand in the market for a single-source ground transportation company," says John McCarthy, newly-elected president of GO Airport Shuttle and president of Continental Air

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Transport in Chicago, which operates GO Airport Express.

"Corporate travel managers, convention managers and travel companies tell us they want to do business with one supplier and one billing system," he explains. "We believe that individual travelers also will appreciate the opportunity to have a single reliable source for airport transportation, regardless of destination.

The company's next largest competitor serves 27 airports -- all in the United States. GO Airport Shuttle, organized as a closely held corporation, is owned and operated by a core group of local operating companies that is licensing the use of the GO identity and reservation system to the others. All local operators are required to adhere to the same set of operating standards.

While positioning itself as a global company, the local operators will remain independently owned and managed.

"Local ownership assures customers they will receive the same high level of customer service in every location," says Paul Seeger, president of GO Airlink Shuttle in New York and GO executive director. "With GO, the boss is always nearby to make sure the passenger experience is comfortable, affordable and on time."

GO Airport Shuttle provides shared-ride transportation service to and from 110 airports around the world. Reservations can be made at <http://www.airportshuttle.com> or 800-544-GOGO (4646).

Contact: Dyana Flanigan or Judi Schindler 312-666-6662 SOURCE GO Airport Shuttle -0- 08/02/2007 /CONTACT: Dyana Flanigan, or Judi Schindler, both for GO Airport Shuttle, +1-312-666-6662 / /Photo: NewsCom: <http://www.newscom.com/cgi-bin/prnh/20070802/AQTH055> AP Archive: <http://photoarchive.ap.org> AP PhotoExpress Network: PRN11 PRN Photo Desk, [photodesk@pnnewswire.com](mailto:photodesk@pnnewswire.com) / Web site: <http://www.airportshuttle.com> / CO: GO Airport Shuttle ST: Illinois, Canada, Mexico, England, France, Italy, Scotland, Spain IN: TRN TRA AIR SU: PDT JP-EA -- AQTH055 -- 5801 08/02/2007 11:04 EDT <http://www.pnnewswire.com>

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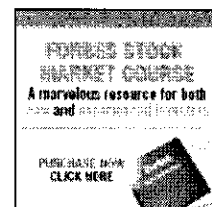


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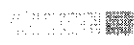
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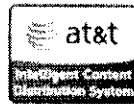


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Passengers 1 Passenger

Pickup Location Select a Location...

Luggage/Service Options Select Options...

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Arrival Flight ?

Airport Select an Airport...


Flight Date  May  16 

Flight Time 02  : 00  PM 

Passengers 1 Passenger

Drop-off Location Select a Location...

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## **WORLD'S LARGEST GROUND TRANSPORTATION COMPANY**



GO Airport Shuttle services more than 100 airports in the United States, Canada, Mexico, Scotland, England, France and Italy. In every location, GO offers the most economical, convenient and safe way to get to and from the airport.

### **Consistent Quality**

We take pride in delivering the same friendly, safe, convenient and economical service in every city.

### **On-Line Reservations**

Our secure on-line reservation system is accessible from anywhere in the world. GO vans can be reserved for one-way or roundtrip transportation at both departure and destination cities.

[http://www.goairportshuttle.com/about\\_us](http://www.goairportshuttle.com/about_us)

5/16/2008